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13 VERIGY US, INC.
14

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN JOSE DIVISION

18 VERIGY US, INC, a Delaware Corporation

19 Plaintiff,

20 vs.

21 ROMI OMAR MAYDER, an individual;
22 WESLEY MAYDER, an individual; SILICON
23 TEST SYSTEMS, INC., a California Corporation;
24 and SILICON TEST SOLUTIONS, LLC, a
25 California Limited Liability Corporation,
26 inclusive,

27 Defendants.
28

Case No. C07 04330 RMW (HRL)

**DECLARATION OF MELINDA M.
MORTON IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE DOCUMENTS UNDER
SEAL**

Judge: Honorable Ronald M. Whyte
Ctrm: 6

1 I, Melinda M. Morton, declare as follows:

2 1. I am an attorney licensed to practice law before all of the courts of the State of
3 California. I am an associate with the law firm of Bergeson, LLP, counsel of record for Plaintiff
4 Verigy US, Inc. ("Verigy" or "Plaintiff") in the above-captioned action. I have personal
5 knowledge of the facts set forth in this declaration, and, if called to do so, I could and would
6 competently testify thereto.

7 2. I submit this declaration in support of Verigy's Administrative Motion for Leave to
8 File Document Under Seal.

9 3. I have reviewed the following materials ("the Materials"):

10 a. Exhibit A to the Joint letter Brief submitted at the Court's request.

11 4. I have determined that these Materials (hereafter "the Materials") disclose
12 information that has been designated as "Confidential" by the parties under the protective order,
13 without objection to those designations (although Verigy reserves its rights to challenge such
14 designations pursuant to the Stipulated Protective Order).

15 5. The confidentiality interest of the parties therefore overcomes the right of public
16 access to the record, as a substantial probability exists that the parties' overriding confidentiality
17 interest will be prejudiced if the record is not sealed. Further, the proposed sealing is narrowly
18 tailored and no less restrictive means exist to achieve this overriding interest.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct and that this declaration was executed this 19th day of June, 2008 at
21 San Jose, California.

22
23 /s/
24 Melinda M. Morton